

Honorable Judge Tana Lin

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STANLEY PACE, an individual

Plaintiff,

v.

JOS DANIEL, an individual,

Defendant.

Case No. 2:20-cv-01455-TL

**CORRECTED DECLARATION OF  
KEITH SCULLY IN SUPPORT OF  
OFFER OF PROOF**

**TRIAL DATE:  
July 5, 2022**

I, Keith Scully, declare as follows:

1. I am counsel of record for Plaintiff Stanley Pace in this matter, over the age of 18, and competent to testify to the matters stated herein.

2. Attached as Exhibit A is true and correct copy of the World Intellectual Property Organization Administrative Panel Decision for Case No. D2020-1966, *Jos Daniel v. Privacy Administrator, Anonymize, Inc. / Stanley Pace*.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

1 Executed on September 6, 2022

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3 s/ Keith Scully

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Keith Scully